



NORTH AMERICA SOUTH AMERICA EUROPE ASIA

1901 L Street, NW
 Washington, DC 20036
 T +1 (202) 282-5000
 F +1 (202) 282-5100

ABBE DAVID LOWELL
 Partner
 (202) 282-5000

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VIA E-MAIL (Ross.Weingarten@usdoj.gov)

Ross Weingarten, Esq.
 Christiaan Highsmith, Esq.
 Assistant United States Attorneys
 450 Golden Gate Avenue
 San Francisco, CA 94102

Re: United States v. Andrade Data Review

Dear Messrs. Weingarten and Highsmith:

Following the Court's April 18, 2023, order, we received from your office a thumb drive for our client to review. The drive has three folders—SVE058067, SVE058075, and SVE058076—together containing over 50GB of UFDR files, including over 2,500 chat threads made up of over 170,000 individual messages. Our review yielded 630 chat communications and 88 instant messages across the three folders in which (i) Robert Abramoff is a participant, or (ii) "Robert Abramoff" appears in chat or instant message body text. None of those communications is privileged. However, none include or mention anything about Marcus Andrade, the AML Bitcoin business or anything that seems relevant to the case. In fact, all are exchanges between and among the Abramoff family about various family issues.

In particular, there are certain purely personal exchanges between brothers Jack and Robert about their aged father, including health and family relationship issues, that we ask to be withheld from any discovery production. We would further request personal identifying information, such as Robert Abramoff's current contact information, also be withheld where practicable. We have undertaken to identify these specific exchanges and contact information in the enclosed log. We understood Judge Beeler had indicated a willingness to review any materials we raised *in camera* and, of course, that could assure Mr. Andrade's counsel that there is nothing discoverable being withheld.

Please let me know if you or the Court have any questions or if a conversation would be helpful to the process.

Sincerely,

Abbe David Lowell

cc: Richard Weber, Esq. (RWeber@winston.com)